

1 Martha G. Bronitsky
2 Chapter 13 Standing Trustee
3 Po Box 5004
4 Hayward, CA 94540
5 (510) 266- 5580

6 Trustee for Debtor(s)

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re
Paul Anthony Green

Chapter 13 Case No. 19-42436-RLE13

debtor(s)

DECLARATION REGARDING DEFAULT AND REQUEST FOR ORDER OF DISMISSAL

13 Comes now Martha G. Bronitsky, Chapter 13 Trustee in the above captioned matter, and
14 requests that the above captioned case be dismissed for cause and upon the following:

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Declaration Regarding Default

The above named debtor(s) is/are in default under the terms of the confirmed plan. Based upon said default, I served upon the debtor(s) and counsel for debtor(s), a MOTION TO DISMISS CHAPTER 13 CASE FOR FAILURE TO MAKE PLAN PAYMENTS [hereinafter "MOTION"] and signed on August 16, 2021. Said MOTION required the debtor to either 1.) bring the case current, or 2.) meet and confer with the Trustee and sign a stipulation resolving the default, or 3.) file and serve an application or motion which would resolve the default. Said MOTION also further provided that upon failure to complete, within 21 days after the date of the MOTION, one of the foregoing, the case would be dismissed forthwith without further notice or hearing.

1 The debtor(s) failed to respond to the MOTION in that they have 1.) failed to bring the case
2 current, the debtor(s) is/are still in default \$12,384.00, which includes this months payment. The
3 last payment was made on July 09, 2021 in the amount of \$4,128.00 2.) have failed to meet and
4 confer with the Trustee to enter into a stipulation resolving the default, or 3.) have failed to file and
5 serve an application or motion resolving the default. The debtor(s) remain in default under the
6 terms of the confirmed plan. Debtor(s) was/were noticed that the case would be dismissed forthwith
7 if the debtor(s) failed to respond to and act upon the MOTION and resolve the default. As of the
8 date of this declaration, the debtor(s) has/have failed to act upon the MOTION.

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10 Wherefore, I declare under penalty of perjury that the foregoing is true and correct.

11 Executed this date in Hayward, California.

12 Date: September 13, 2021

/s/ Martha G. Bronitsky

13 Signature of Martha G. Bronitsky
14 Chapter 13 Standing Trustee

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1 CERTIFICATE OF SERVICE

2 I HEREBY CERTIFY that I have served a copy of the within and foregoing document
3 on the debtor (s), counsel for debtor (s), and if applicable, the creditor, creditor
4 representatives and the registered agent for the creditor by depositing it in the United
States mail with first class postage attached thereto.

5 I declare under penalty of perjury under the laws of the State of California that the
foregoing is true and correct.
6

7 Financial Relief Law Center
8 Paul Anthony Green 1200 Main St #G
Irvine,CA 92614

9 Po Box 56333 (Counsel for Debtor)
10 Hayward,CA 94545

11 (Debtor(s))

12 Date: September 13, 2021

13 /s/ CHRISTIE PINEDA
CHRISTIE PINEDA

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